

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Crim. No. 1:20-cr-00143
Honorable T.S. Ellis, III

Pretrial Conference: Apr. 9, 2021
Trial: Apr. 26, 2021

NOTICE OF CORRECTION

Mr. Zackary Ellis Sanders, by and through undersigned counsel, respectfully submits this Notice of Correction to rectify an error in his Reply to Government's Response to Mr. Sanders's Opposition to 414 Notice (ECF No. 216). On page 4, that Reply incorrectly states that Mr. Sanders made "involuntary and *reliable* statements that he unknowingly and accidentally received child pornography when he was a child," *id.* at 4 (emphasis added); instead, the Reply should state that Mr. Sanders made "involuntary and *unreliable* statements that he unknowingly and accidentally received child pornography when he was a child." *See id.* at 3-4 ("the statements themselves are not reliable because they were made involuntarily and under coercion after hours of interrogation . . . [T]he statements cannot be considered reliable").

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of January 2021, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress

Jonathan Jeffress